

SueSteib.041306

1

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
JACKSON DIVISION

OLIVIA Y., ET AL. PLAINTIFFS
VERSUS CIVIL ACTION NO. 3:04CV251LN
HALEY BARBOUR, ET AL. DEFENDANTS

DEPOSITION OF DR. SUE STEIB

Deposition Taken at the Instance of Plaintiffs
In the Offices of Bradley, Arant, Rose & White
Jackson, Mississippi
On April 13, 2006
Commencing at 8:45 a.m.

REPORTED BY: CHERIE G. BOND, RMR
Mississippi CSR #1012

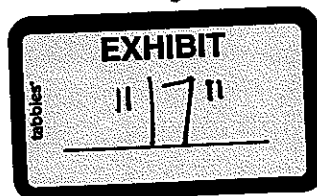
BOND & ASSOCIATES
107 Mill Creek Corners, Suite C
Brandon, Mississippi 39047
(601) 936-4466

2

APPEARANCES:

MS. SUSAN LAMBAISE
Children's Rights
330 7th Avenue, Fourth Floor
New York, New York 10001

REPRESENTING PLAINTIFFS
Page 1



22 A SueSteib.041306
I wrote the report.

23 Q Okay. And how many drafts of the report
24 were there?

25 A Oh, I don't know because I just start a 53
1 document, and I just keep working on it until it's
2 done.

3 Q So when did you start the document?

4 A Some time ago. I began to compile
5 components and an outline becomes a piece of a
6 document and then I just build on it.

7 Q When did that begin approximately? Was it
8 in '06, was it in '05?

9 A Probably the actual components of this
10 report I probably began in '06, I mean this actual
11 outline of this document.

12 Q And did you share the draft with folks at
13 DHS or the AG's office or DCFS -- DFCS?

14 A Not of this document, I don't believe.
15 There are drafts of -- of some documents that have
16 some components that are in this report.

17 Q Uh-huh.

18 A But, no, not of this -- no, no drafts of
19 this were produced for them.

20 Q Drafts of components were?

21 A Not -- some of the earlier documents that
22 were shared with DFCS have pieces that are also
23 referenced in this report, things like staffing, for
24 example. But no drafts of this report.

25 Q Until it was made final? 54

1 A Yes.

2 MS. LAMBIASE: And I'll ask again I don't
Page 43

Suesteib.041306

3 believe I got copies of any of those components so
4 I'll renew that request.

5 A No, you did.

6 BY MS. LAMBIASE:

7 Q I don't think so.

8 MS. RACHAL: We'll look at it again. If we
9 haven't produced it, we will but we produced
10 everything we were given.

11 A They were all attached to my e-mails that I
12 produced.

13 BY MS. LAMBIASE:

14 Q Might be that I didn't get the attachments.

15 A Okay.

16 Q And I'm going to show you what we'll have
17 marked as 176.

18 (Exhibit 176 marked)

19 BY MS. LAMBIASE:

20 Q It's called a document review list and at
21 the bottom it's got the Child Welfare League of
22 America's footer with the date of 6/23/05. It's Steib
23 000044, just the one page. Do you recognize that
24 document?

25 A Yes.

55

1 Q Did you prepare this document?

2 A No.

3 Q Who prepared it?

4 A Charlene Ingram.

5 Q Okay. Is this a document review list of the
6 documents you've received or the documents you were
7 requesting or something else?

8 A This was the list of the documents that we
Page 44